

UNITED STATES OF AMERICA

v.

Manning, Bradley E.  
PFC, U.S. Army,  
HHC, U.S. Army Garrison,  
Joint Base Myer-Henderson Hall  
Fort Myer, Virginia 22211

Updated Prosecution Witness List

15 October 2012

The prosecution may call the below witnesses to testify on the merits at trial and/or during the presentencing phase<sup>1</sup> of the above-captioned court-martial. After each witness name is a brief description of the general substance of witness testimony, including whether the prosecution currently intends to elicit classified information during their testimony.

1. (b) (7) (A-C) He will testify about enemies of the United States, including classified information.
2. (b) (7) (A-C) He will testify about the accused's training, activities, and duties.
3. (b) (7) (A-C) She will testify concerning the accused's execution of an SCI NDA.
4. (b) (7) (A-C) . She will testify as to the authenticity of the OPM records.
5. (b) (7) (A-C) . He will testify as to the authenticity of the OSC logs.
6. (b) (7) (A-C) She will testify as to the authenticity of the JAMMS records.
7. (b) (7) (A-C) . She will testify concerning her use of the supply room computer.
8. (b) (7) (A-C) He will testify about the accused's intelligence systems training and the accused's activities at 2/10, including potential classified information.
9. (b) (7) (A-C) He will testify as to the authenticity of the ACIC logs, including classified information.

<sup>1</sup> As of the date of this filing, persons identified with an asterisk ("\*") are witnesses only for purposes of the presentencing phase.

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10. (b) (7) (A-C) [REDACTED]  
He will testify about the accused's activity in his CHU and the accused's activities at 2/10.
11. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] She will testify about her deployment with the accused and the duties of a 35F, including classified information.
12. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] He will testify about the requirements of being a 35F, the accused's duties and work product, including classified information.
13. (b) (7) (A-C) [REDACTED]  
[REDACTED]. He will testify as to the authenticity of the AIT documents.
14. (b) (7) (A-C) [REDACTED]. He will testify about the requirements for access to government systems at 10th Mountain Division.
15. (b) (7) (A-C) [REDACTED]  
[REDACTED] He will testify about the IA training the accused received, authentication of multiple pieces of evidence, and the information that the accused leaked to WikiLeaks, including classified information.
16. (b) (7) (A-C) [REDACTED]  
[REDACTED] He will testify about the accused's duties in the supply room and the accused's access to computer systems.
17. (b) (7) (A-C) [REDACTED]  
He will testify about the CIDNE database, its value, and how it appeared at a particular time, including classified information.
18. (b) (7) (A-C) [REDACTED] He is a chain of custody witness.
19. (b) (7) (A-C) [REDACTED] He will testify as to the authenticity of the Intelink logs, including classified information.
20. (b) (7) (A-C) [REDACTED]  
[REDACTED] He will testify at sentencing about the impact on the Department of Defense, including classified information.
21. (b) (7) (A-C) [REDACTED] He will testify about how the ACIC logs, including classified information.

22. (b) (7) (A-C) [REDACTED]  
[REDACTED] He will testify about the 2/10 Mountain share drive and its contents, as well as the requirements to access it.
23. (b) (7) (A-C) [REDACTED]  
[REDACTED] He will testify at sentencing about the impact on a specific AOR within the Department of Defense, including classified information.
24. (b) (7) (A-C) [REDACTED]  
[REDACTED] He is a chain of custody witness.
25. (b) (7) (A-C) [REDACTED] He will testify about the Centaur logs, including potential classified information.
26. (b) (7) (A-C) [REDACTED]  
[REDACTED] He will testify as to the authenticity of the accused's OMPF.
27. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] She will testify about the accused's work product and the accused's activities within 2/10, including classified information.
28. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] She will testify at sentencing about the impact to Near Eastern Affairs, including classified information.
29. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] He will testify at sentencing about the impact to International Security, including classified information.
30. (b) (7) (A-C) [REDACTED]  
[REDACTED] He will testify at sentencing about the impact on operations within the USCENTCOM AOR, including classified information.
31. (b) (7) (A-C) [REDACTED]  
[REDACTED] He will testify about Centaur logs, including potentially classified information.
32. (b) (7) (A-C) [REDACTED]. He is a chain of custody witness.
33. (b) (7) (A-C) [REDACTED]  
[REDACTED]. He is a chain of custody witness.

34. (b) (7) (A-C) He is a chain of custody witness.
35. (b) (7) (A-C) He will testify about the content of cables originating from and sent to the Western Hemisphere on the merits and the impact to Western Hemisphere Affairs on sentencing, including classified information.
36. (b) (7) (A-C) He will testify as to the authenticity of the accused's IA training.
37. (b) (7) (A-C) He will testify about the accused's activities while deployed.
38. (b) (7) (A-C) will testify about the the accused's training, duties, and work product, including classified information.
39. (b) (7) (A-C) He is a chain of custody witness.
40. (b) (7) (A-C) She will testify about a Department of the Army classified charged document, including classified information.
41. (b) (7) (A-C) He is a chain of custody witness.
42. (b) (7) (A-C) She will testify about the law enforcement investigation in Iraq.
43. (b) (7) (A-C) He will testify about the USCENCOM server logs, including potentially classified information.
44. (b) (7) (A-C) He will testify at sentencing about impact to South and Central Asian Affairs, including classified information.
45. (b) (7) (A-C) He will testify about the accused's work product, including classified information.
46. He will testify about information security.

47. (b) (7) (A-C) [REDACTED]  
[REDACTED] He will testify as an original classification authority (OCA) that charged information was properly classified, including classified information.
48. (b) (7) (A-C) [REDACTED]  
[REDACTED]. He will testify about the CIDNE database, including potentially classified information.
49. (b) (7) (A-C) [REDACTED]  
[REDACTED] He will testify about the CIDNE database, including potentially classified information.
50. (b) (7) (A-C) [REDACTED]  
[REDACTED] He will testify about the CIDNE database, including potentially classified information.
51. (b) (7) (A-C) [REDACTED]  
[REDACTED] She will testify about her forensic analysis of digital media, not belonging to the accused, including classified information.
52. (b) (7) (A-C) [REDACTED] He will testify about the C3 document.
53. (b) (7) (A-C) [REDACTED]  
[REDACTED] He will testify about the content of charged documents containing J5 information, including classified information.
54. (b) (7) (A-C) [REDACTED]  
[REDACTED] She will testify about the authenticity of the accused's SCI Indoctrination packet.
55. (b) (7) (A-C) [REDACTED]  
[REDACTED] He will testify about OPSEC.
56. (b) (7) (A-C) [REDACTED]  
[REDACTED]. She is a chain of custody witness.
57. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] She will testify concerning requirements of being a 35F.
58. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] He will testify about the authenticity and chain of custody of the DoS server logs.
59. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED]

(b) (7) (A-C) He will testify about NCD, including potentially classified information.

60. (b) (7) (A-C) He will testify about his forensic analysis of the accused's digital media, including classified information.

61. (b) (7) (A-C) He will testify on sentencing about the impact to the Department of State, including classified information.

62. (b) (7) (A-C) He is a chain of custody witness.

63. (b) (7) (A-C) He will testify in sentencing about the impact to the Department of Defense, including classified information.

64. (b) (7) (A-C) He will testify on sentencing about the impact on individuals classified as persons at risk by the Department of State, including classified information. This testimony will not include PII of any specific individual.

65. (b) (7) (A-C) He will testify regarding his digital chat with the accused. The United States does not intend to elicit any classified information contained within the digital chat log.

66. (b) (7) (A-C) He will testify about the content of the Apache Video.

67. (b) (7) (A-C) He will testify about counterintelligence and the value of information, including classified information.

68. (b) (7) (A-C) He will testify about the 2/10 Mountain share drive and its contents, the accused's training and duties, including potentially classified information.

69. (b) (7) (A-C) She will testify about the investigation in Iraq.

70. (b) (7) (A-C) He is a chain of custody witness.
71. \* (b) (7) (A-C) He will testify at sentencing about a specific category of impact on the United States Government and the Department of Defense, including classified information.
72. (b) (7) (A-C) He will testify about the 35F training, 2/10 pre-deployment training, and the use of his SIPRNET computers while deployed, including potentially classified information.
73. (b) (7) (A-C) He will testify about the accused's training at AIT.
74. (b) (7) (A-C) She is a chain of custody witness.
75. (b) (7) (A-C) He will testify about Wikileaks operations, the investigation of the accused, and certain enemies of the United States being in possession of information, including classified information.
76. (b) (7) (A-C) He will testify about the accused's training at AIT.
77. (b) (7) (A-C) He will testify about how Intelink logs, including potentially classified information.
78. (b) (7) (A-C) He will testify at sentencing about the impact on USCENTCOM, including classified information.
79. (b) (7) (A-C) He will testify on sentencing about impact concerning IEDs, including classified information.
80. (b) (7) (A-C) He will testify about the DCGS-A system, including potentially classified information.
81. (b) (7) (A-C) He will testify about the training received at AIT.

82. \* (b) (7) (A-C) [REDACTED]. He will testify at sentencing about the impact on strategic planning within the USCENTCOM AOR, including classified information.
83. (b) (7) (A-C) [REDACTED]. He is a chain of custody witness.
84. (b) (7) (A-C) [REDACTED]. She is a chain of custody witness.
85. (b) (7) (A-C) [REDACTED] He will testify about the accused's misconduct and multiple investigations.
86. (b) (7) (A-C) [REDACTED]. He will testify about the accused's access to DCGS-A, including potentially classified information.
87. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] He will testify about the content of cables originating from South and Central Asia on the merits, including classified information.
88. (b) (7) (A-C) [REDACTED] He will testify about the information posted to the USCENTCOM OSJA SIPRNET website, including potentially classified information.
89. (b) (7) (A-C) [REDACTED]. He will testify about the JTF-GTMO database and the contents of compromised information, including classified information.
90. (b) (7) (A-C) [REDACTED]. He will testify about instructing the accused at AIT.
91. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED]. He will testify on sentencing about the impact on East Asian and Pacific Affairs, including classified information.
92. (b) (7) (A-C) [REDACTED]. He will testify about the authenticity of the Centaur logs.
93. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] He will testify about the authenticity and chain of custody of the DoS firewall logs, including potentially classified information.



94. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] He will testify as an OCA that Department of State information was properly classified, including classified information.
95. (b) (7) (A-C) [REDACTED]  
[REDACTED] will testify at sentencing about the impact on a specific AOR, including classified information.
96. (b) (7) (A-C) [REDACTED]  
He will testify about the content of charged documents containing J3 information, including classified information.
97. (b) (7) (A-C) [REDACTED] He will testify about the USF-I GAL.
98. (b) (7) (A-C) [REDACTED]  
[REDACTED] 754. She will testify about the accused's activities at AIT.
99. (b) (7) (A-C) [REDACTED]  
[REDACTED] He is a chain of custody witness, including classified information.
100. (b) (7) (A-C) [REDACTED] He will testify about the accused's training and duties and his interactions with the accused while deployed, including potentially classified information.
101. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] He will testify about the content of cables originating from Afghanistan and Pakistan on the merits, including classified information.
102. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] He will testify about the content of cables originating from International Organizations on the merits, including classified information.
103. \* (b) (7) (A-C) [REDACTED]. He will testify on sentencing about the impact on USCENTCOM within the AOR, including classified information.
104. (b) (7) (A-C) [REDACTED]  
[REDACTED] He will testify about access to computer systems within the brigade.

105. (b) (7) (A-C) [REDACTED]  
[REDACTED] She is a chain of custody witness.
106. (b) (7) (A-C) [REDACTED]  
[REDACTED] He is a chain of custody witness.
107. (b) (7) (A-C) [REDACTED]  
He will testify on sentencing about the impact on operations in Iraq, including classified information.
108. (b) (7) (A-C) [REDACTED]  
[REDACTED]. He will testify about his forensic analysis of the accused's digital media, including classified information.
109. (b) (7) (A-C) [REDACTED]  
[REDACTED] She will testify as to the authenticity of the DoD IA awareness training.
110. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED]. He will testify about the chain of custody of the DoS firewall and server logs, as well as the impact of the compromise on the US Embassy at Reykjavik, including classified information.
111. (b) (7) (A-C) [REDACTED]  
[REDACTED] He is a chain of custody witness, including potentially classified information.
112. (b) (7) (A-C) [REDACTED]  
[REDACTED]. He will testify about the US Army computer systems, including their values, including potentially classified information.
113. (b) (7) (A-C) [REDACTED]  
[REDACTED] He will testify about his interactions with the accused at 2/10 Mountain and the accused's activities during their deployment, including potentially classified material.
114. (b) (7) (A-C) [REDACTED]  
[REDACTED] He will testify about the authenticity of the accused's annual Information Awareness training.
115. (b) (7) (A-C) [REDACTED] he  
will testify about the response to the FOIA request for the Apache video, including potentially classified material.
116. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] He will testify about the content of cables originating from the Near East on the merits, including classified information.

117. (b) (7) (A-C) [REDACTED]  
[REDACTED]. He will testify about his forensic analysis of the accused's digital media and information posted to WikiLeaks, including classified information.
118. (b) (7) (A-C) [REDACTED] She will testify about the training the accused received before deployment, the accused's statements and activities before deployment, their duties during deployment and the accused's activities during deployment, including potentially classified information.
119. (b) (7) (A-C) [REDACTED]  
[REDACTED] He is a chain of custody witness, including potentially classified information.
120. (b) (7) (A-C) [REDACTED] He will testify about the investigation in Iraq.
121. (b) (7) (A-C) [REDACTED]  
[REDACTED] is a chain of custody witness.
122. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] She will testify that she was the 2-10 security manager and witnessed the accused sign NDAs and acknowledgement of SCI briefings.
123. (b) (7) (A-C) [REDACTED]  
[REDACTED]. He will testify to the authenticity of the accused's ATTRS logs.
124. (b) (7) (A-C) [REDACTED]  
[REDACTED]. He is a chain of custody witness.
125. (b) (7) (A-C) [REDACTED]  
[REDACTED]. She will testify to the authenticity of the CIA Wire logs.
126. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] She will testify at sentencing about the impact to information systems at the Department of State, including potentially classified information.
127. (b) (7) (A-C) [REDACTED]  
[REDACTED]. He is a chain of custody witness, including potentially classified information.
128. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED]. She will

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testify to the authenticity of Department of State documentation, including potentially classified information.

129. (b) (7) (A-C) [REDACTED]. He will testify about the training received at AIT.
130. (b) (7) (A-C) [REDACTED] He will testify about the content of charged documents containing J2 information, including classified information.
131. (b) (7) (A-C) [REDACTED]. He will testify about the USCENCOM Sharepoint Server logs, including potentially classified information.
132. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] She will testify on sentencing about impact to the counter terrorism effort, including classified information.
133. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] He is a chain of custody witness.
134. (b) (7) (A-C) [REDACTED]  
[REDACTED] He will testify about information assurance.
135. (b) (7) (A-C) [REDACTED]  
[REDACTED] She will testify to the authenticity of DCGS-A documentation.
136. (b) (7) (A-C) [REDACTED]  
He is a chain of custody witness.
137. (b) (7) (A-C) [REDACTED]  
[REDACTED] He will testify about his forensic analysis of the accused's digital media.
138. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] He will testify about the NCD system, including potentially classified information.
139. (b) (7) (A-C) [REDACTED]  
[REDACTED] He is a chain of custody witness.

140. (b) (7) (A-C) [REDACTED]  
[REDACTED]. He will testify as an OCA that JTF-GTMO information was properly classified, including classified information.
141. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] 6. He will testify about the content of cables originating from Africa on the merits, including classified information.
142. (b) (7) (A-C) [REDACTED]  
[REDACTED] He is a chain of custody witness.
143. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED]. She will testify about the content of cables originating from or sent to Europe or Eurasia on the merits, including classified information.
144. (b) (7) (A-C) [REDACTED]  
[REDACTED]  
[REDACTED] He will testify about the content of cables originating from East Asia and the Pacific on the merits, including classified information.

Several of these witnesses may become unnecessary depending on the outcome of subsequent Court rulings. The prosecution may add witnesses to this list, depending on the outcome of subsequent Court rulings, to include those relating to Military Rule of Evidence (MRE) 505 and any witnesses relating thereto. The prosecution may replace witnesses on this list, should it become necessary due to a Permanent Change of Station, job relocation, change in job position, or change in level of security clearance of a listed witness.

The prosecution acknowledges an ongoing obligation to provide the defense prompt notice of any other potential witnesses that come to its attention and will adhere to the local rules. The prosecution will communicate its final witness list according to Rule 2.1.8 of the Rules of Practice before Army Courts-Martial (2012) and the Court's order.

If the defense intends to produce a witness who is listed above, the defense must provide a separate, appropriate request for that witness in accordance with Rule for Courts-Martial (RCM) 703 and the standard articulated in United States v. Rockwood, 52 M.J. 98, 105 (1999) that a witness request include a "synopsis of expected testimony," not merely a list of topics to be covered. If necessary for a particular witness employed by the United States Government, the defense shall also comply with 5 U.S.C. § 301 and Touhy v. Ragen, 340 U.S. 462 (1951).



ASHDEN FEIN  
MAJ, JA  
Trial Counsel

Enclosure  
Classified Supplement to Witness List

I certify that I served or caused to be served a true copy of the above on Mr. David Coombs, Civilian Defense Counsel via electronic mail, on 15 October 2012.



ASHDEN FEIN  
MAJ, JA  
Trial Counsel